


EXHIBIT A

MAY/02/2019/THU 03:07 PM MDJ23106

FAX No. 610-921-3625

P. 006/012

COMMONWEALTH OF PENNSYLVANIA COUNTY OF BERKS				POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.	
Magisterial District Number: 23-1-06		DEFENDANT: (NAME and ADDRESS):			
MDJ: Hon. DEAN R. PATTON 3200 READING CREST AVE		VINCENT JOSEPH SMITH First Name Middle Name Last Name			
Address: READING, PA 19605		9 ST LUCIA CT SINKING SPRING PA 19608			
Telephone: (610) 929-4440					
NCIC Extradition Code Type					
<input type="checkbox"/> 1-Felony Full <input type="checkbox"/> 5-Felony Pend. <input type="checkbox"/> C-Misdemeanor Surrounding States <input type="checkbox"/> Distance: <input type="checkbox"/> 2-Felony Ltd. <input type="checkbox"/> 6-Felony Pend. Extradition Determ. <input type="checkbox"/> D-Misdemeanor No Extradition <input checked="" type="checkbox"/> 3-Felony Surrounding States <input type="checkbox"/> A-Misdemeanor Full <input type="checkbox"/> E-Misdemeanor Pending <input type="checkbox"/> 4-Felony No Ext <input type="checkbox"/> B-Misdemeanor Limited <input type="checkbox"/> F-Misdemeanor Pending Extradition Determ.					
DEFENDANT IDENTIFICATION INFORMATION					
Docket Number CR203-19	Date Filed 5/2/19	DMV/Livescan Number 4704166-1	Complaint/Incident Number 66-19-06347	Request Lab Service? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/19/1962	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>	
AKA		First Name	Middle Name	Last Name	Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
HAIR COLOR <input checked="" type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
EYE COLOR <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location			WEIGHT (lbs) 185	
FBI Number	MNU Number			FLY HEIGHT 5 8	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					
Fingerprint Classification					
DEFENDANT VEHICLE INFORMATION					
Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color
					Reg. same as Def. <input type="checkbox"/>

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved Because: _____

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth Prior to filing. See Pa.R.Crim.P. 507).

(Name of the attorney for the Commonwealth) _____ (Signature of the attorney for the Commonwealth) _____ (Date) _____

I, JAMES A. POLLOCK (Name of the Affiant)		9620 JAP22 PSP/MPOETC-Assigned Affiant ID Number and Badge #	
of Muhlenberg Township Police (Identify Department or Agency Represented and Political Subdivision)		PA0061300 (Police Agency ORI Number)	
do hereby state: (check appropriate box)			
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above			
<input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____			
<input type="checkbox"/> I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe			
with violating the penal laws of the Commonwealth of Pennsylvania at [102] MUHLENBERG TOWNSHIP (Subdivision Code) (Place/Political Subdivision)			
THE BAIL SHOP 2834 N 5TH ST HWY READING, PA			
in BERKS County [06] on or about Between 04/15/2019 1200 and 04/27/2019 1630 (County Code) (Offense Date)			

MAY/02/2019/THU 03:07 PM MDJ23106

FAX No. 610-921-3625

P. 007/012

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR 203-19	Date Filed: 5/2/19	OTN/LiveScan Number 4704166-1	Complaint/Incident Number 66-19-06347
Defendant Name	First: VINCENT	Middle: JOSEPH	Last: SMITH

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.

4. This complaint consists of the preceding page(s) numbered _____ through _____.

5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

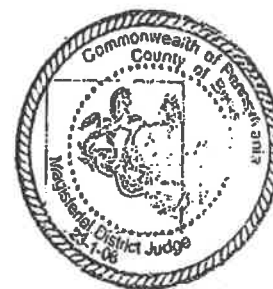
 5/2/19 (Date) _____
 (Signature of Affiant)

AND NOW, on this date 5/2/19 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

23106
 (Magisterial District Court Number)

 (Issuing Authority)



MAY/02/2019/THU 03:07 PM MDJ23106

FAX No. 610-921-3625

P. 008/012



POLICE CRIMINAL COMPLAINT

Docket Number: CR203-19	Date Filed: 5/2/19	OTN/LiveScan Number 4 704 KCP-1	Complaint/Incident Number 66-19-06347
Defendant Name	First: VINCENT	Middle: JOSEPH	Last: SMITH

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input checked="" type="checkbox"/> 1	3922	(a)(1)	of the	PA Crimes Code	1	F3	110 26A
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code AOPC/UCR/NIBRS Code

PennDOT Data (If Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

THFT BY DEC/FLSE IMPRSS

Acts of the accused associated with this Offense:

18PaCS 3922(a)(1) Theft by Deception F3

IN THAT, on or about said date, THE DEFENDANT intentionally obtained or withheld property, namely, \$5000.00 cash belonging to Dinora Vasquez, , by creating or reinforcing a false Impression, namely, Vasquez presented \$5000.00 cash to The Bail Shop for bail on her son Jess Morales, the owner of The Bail Shop is Kaley Damore (daughter of Defendant) present during the cash transaction In the business was The Defendant who was watching as the money was counted by The Office Staff , as to law, value, intention or other state of mind, this being in violation of section 3922(a)(1) of the PA Crimes Code

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input type="checkbox"/> 2	3925	(a)	of the	PA Crimes Code	1	F3	130 280
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code AOPC/UCR/NIBRS Code

PennDOT Data (If Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

RECEIVING STOLEN PROPERTY

Acts of the accused associated with this Offense:

PACC 3925(a) Receiving Stolen Property, F3

IN THAT, on or about said date, THE DEFENDANT did intentionally receive, retain or dispose of movable property, namely, \$5000.00 cash, belonging to Dinora Vasquez, with no intent to restore it to the owner, knowing that such property was stolen, or believing that It had probably been stolen, in violation of Section 3925(a) of the PA Crimes Code.

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P. 009/012



POLICE CRIMINAL COMPLAINT

Docket Number: CR 203-19	Date Filed: 5/2/19	OTN/LiveScan Number U 7041060-1	Complaint/Incident Number 66-19-06347
Defendant Name	First: VINCENT	Middle: JOSEPH	Last: SMITH

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/> Lead?	Offense # 3	Section 4107	Subsection (a)(2)	of the PA Crimes Code	Counts 1	Grade F3	NCIC Code 110	AOPC/UCR/NIBRS Code 26B
PennDOT Data (If Applicable)	Accident Number	PA Statute (Title)		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (Include the name of the statute or ordinance):

DECEPT/BUSINESS/QUANTITY

Acts of the accused associated with this Offense:

PACC 4107(a)(2) Deceptive or Fraudulent Business Practices, F3

IN THAT, on or about said date, THE DEFENDANT in the course of business, did sell, offer or expose for sale, or deliver less than the represented quantity of a commodity or service, namely, took \$5000.00 cash from Dinora Vasquez while purporting to operate as a licensed Bail Agent in Berks County PA then never submitting the bail to The Berks County Court System to get Jesse Morales (son of victim) out of Berks County Prison, Berks County Clerk of Courts has not issued nor is The Bail Shop and its owner Kaley Damore and her father Vincent Smith (Defendant) certified to write bail in Berks County PA The Defendant was present when the money was presented to office staff and also present on a follow up date when victim tried to find out what was going on with her money and the bail. , In violation of Section 4107(a)(2) of the Crimes Code.

FILED ON INFORMATION RECEIVED AND INVESTIGATION CONDUCTED.

MAY/02/2019/THU 03:07 PM MDJ23106

FAX No. 610-921-3625

P. 010/012

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR203-19	Date Filed: 5/2/19	OTN/LiveScan Number: U 704166-1	Complaint/Incident Number: 66-19-06347
Defendant Name: VINCENT	First: VINCENT	Middle: JOSEPH	Last: SMITH

AFFIDAVIT OF PROBABLE CAUSE

On April 27, 2019 Dinora Vasquez contacted Muhlenberg Police Officer Samuel Calabria to report the following theft of money from her.

Vasquez went to The Bail Shop on April 15, 2019 located at 2845 N, 5th St. Highway and presented \$5000.00 cash to the office staff (Belisa Luna and Ms. Janeyris) in an effort to get her son Jesse Morales bailed out of jail. Kaley Damore is listed as the President of the Company and Bail Agent. Her father Vincent Smith was present in the office during this transaction and was watching as the \$5000.00 cash was counted out.

Vasquez came to the Police station on April 27, 2019 as her son still had not been released from jail and that The Bail Shop has not done anything to present the \$5000.00 that she gave them in an effort to bail her son out of jail. When Vasquez went back to the Bail Shop to find out what was happening she was told they were waiting on their insurance to be approved so that the bail could be presented.

On April 30, 2019 this Investigator spoke with Beth Bond Deputy Clerk of the Berks County Clerk of Courts. She advised that The Bail Shop and Kaley Damore have never been issued a Bond License to write bail in Berks County and that both Kaley Damore and her father Vincent Smith have had their Bail Bond Agent licenses suspended by both The County of Berks and The PA Insurance Department. This was also confirmed with David J. Sweitzer Division Chief of Pennsylvania Insurance Department Bureau of Licensing and Enforcement.

FILED ON INFORMATION RECEIVED AND INVESTIGATION CONDUCTED.

I, JAMES A. POLLOCK, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this 2 day of May

5/2/19 Date

(Signature of Magisterial District Judge)
[Signature]
Magisterial District Judge

My commission expires first Monday of January, 2020



MAY/02/2019/THU 03:03 PM MDJ23106

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P. 011/012

Please provide the following information for each co-defendant

**Co-Defendant Data Sheet**

Docket Number: CR 203-19	Date Filed: 5/2/19	OTN/LiveScan Number 4 704100-1	Complaint/Incident Number 66-19-06347
Defendant Name: VINCENT	First: JOSEPH	Middle:	Last: SMITH

Complaint/Incident Number: 66-19-06347	Co-Defendant # <u>1</u>
KALEY ELIZABETH DAMORE	
(Name)	
5107 STOUTS FERRY BRIDGE RD	
(Home Street Address)	
READING, PA 19605	(610) 401-1207
(City, State & ZIP Code)	(Telephone #)

EXHIBIT B

MAY/02/2019/THU 03:06 PM MDJ23106

FAX No. 610-921-3625

P. 001/012

ATTACHMENT II

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BERKS

Arrest Warrant

File Copy

Mag. Dist. No. : MDJ-23-1-06
 MDJ Name : Honorable Dean R. Patton
 Address : 3200 Reading Crest Avenue
 Reading, PA 19605
 Telephone : 610-929-4440

Commonwealth of Pennsylvania
 v.
 Vincent J Smith

Complaint No:	66 19 06347	Issued For:	Vincent J Smith
Charging Officer:	Pollock, James A. Jr.	Docket No:	MJ-23106-CR-0000203-2019
Arresting Agency:	Muhlenberg Township Police Dept	NCIC OFF:	
Case Filed:	05/02/2019	OOC:	
OTN:	U 704166-1	WARRANT ID:	DIS708594974
Reason For Warrant:	Felony	Warrant Control No:	23106-AW-0000249-2019
Offense Date:	04/15/2019		
Lead Offense:	18 § 3922 §§ A1 Theft By Decep-False Impression		

- 15

TO THE AGENCY: Berks County Sheriff

In the name of the Commonwealth of Pennsylvania, you are commanded to take the defendant, Vincent J Smith, into custody. When the defendant is taken into custody, bring the defendant before me at the Court address shown above to answer the complaint charging the defendant with the offense(s) set forth above and further to be dealt with according to law.

Witness the hand and official seal of the issuing authority on this 2nd day of May, 2019.

May 02, 2019

Date

Magisterial District Judge Dean R. Patton



MJ-23106-CR-0000203-2019

23106-AW-0000249-2019

Vincent J Smith

MDJS 417
 Printed: 05/02/2019 10:31:50AM



FREE INTERPRETER
www.pacourts.us/language-rights
 610-929-4440

EXHIBIT C

11/2019/THU 03:04 PM MDJ23106

FAX No. 610-921-3625

P. 001

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF BERKS

Magisterial District Number: 23-1-08

MDJ: Hon. DEAN R. PATTON
3200 READING CREST AVE

Address: READING, PA 19605

Telephone: (610) 929-4440

**POLICE CRIMINAL COMPLAINT**
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

KALEY ELIZABETH DAMORE
First Name Middle Name Last Name
5107 STOUTTS FERRY BRIDGE RD
READING PA 19605

Gen

NCIC Extradition Code Type:

☐ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance:

☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition

☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending

☐ 4-Felony No Ext ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR204-19 Date Filed: 5/19/19 OTN/Livescan Number: 4704202-2 Complaint/Incident Number: 66-19-06347 Request Lab Services? ☐ YES ☒ NO

GENDER: ☐ Male ☒ Female DOB: 10/30/1991 POB: AKA: First Name: Middle Name: Last Name: Add'l DOB: Co-Defendant(s): ☐ Gen.

RACE: ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY: ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR: ☐ GRY (Gray) ☐ RED (Red/Aubn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown)

☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk/Bald) ☐ GRN (Green) ☐ PNK (Pink)

☒ BLN (Blonde / Strawberry)

EYE COLOR: ☐ BLK (Black) ☐ BLU (Blue) ☐ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray)

☒ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

DNA: ☐ YES ☒ NO DNA Location: WEIGHT (lbs): 135

FBI Number: MINU Number: HEIGHT (in): 5 2

DEFENDANT VEHICLE INFORMATION

Plate #: State: Hazmat: Registration Sticker (MM/YY): Comm'l Veh. Ind.: School Veh.: Oth. NCIC Veh. Code: Reg. same as Def.: ☐

VIN: Year: Make: Model: Style: Color:

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved Because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth Prior to filing. See Pa.R.Crim.P. 507.)

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, JAMES A. POLLOCK

(Name of the Affiant)

9620

JAP22

PSP/MP/OTC - Assigned Affiant ID Number and Badge #

of Muhlenberg Township Police

(Identify Department or Agency Represented and Political Subdivision)

PA0061300

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
- ☐ I accuse the defendant whose name is unknown to me but who is described as

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [102] MUHLENBERG TOWNSHIP
(Subdivision Code) (Place/Political Subdivision)

THE BAIL SHOP 2834 N 6TH ST HWY READING, PA

in BERKS County [06] on or about Between 04/16/2019 1200 and 04/27/2019 1630
(County Code) (Offense Date)

/2619/THU 03:04 PM MDJ23106

FAX No. 610-921-3625

P. 038

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR 204-19	Date Filed: 5/2/19	OTN/LiveScan Number 4704202-2	Complain/Victim Number 66-19-06347
First: KALEY		Middle: ELIZABETH	Last: DAMORE

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.

4. This complaint consists of the preceding page(s) numbered _____ through _____.

5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

_____ 5/2/19 _____
(Date) (Signature of Affiant)

AND NOW, on this date 5/2/19 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

23-1-06
(Magisterial District Court Number)

(Issuing Authority)



1/20/19/THU 03:05 PM MDJ23106

FAX No. 610-921-3625

P. 009



POLICE CRIMINAL COMPLAINT

Docket Number: CR 204-19	Date Filed: 5/2/19	OTN/LiveScan Number 4704202-2	Complaint/Incident Number 68-19-06347
Defendant Name: KALEY	First ELIZABETH	Middle DAMORE	Last

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/> 1	3922	(a)(1)	of the	PA Crimes Code	1	F3	110	28A
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Lead? Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	AOPC/UCR/NIBRS Code

Statute Description (Include the name of the statute or ordinance):
THFT BY DEC/FLSE IMPRSS

Acts of the accused associated with this Offense:
18PaCS 3922(a)(1) Theft by Deception f3

IN THAT, on or about said date, THE DEFENDANT intentionally obtained or withheld property, namely, \$5000.00 cash, belonging to Dinora Vasquez, by creating or reinforcing a false impression, namely, Vasquez presented \$5000.00 cash to The Ball Shop for ball on her son Jesse Morales, the owner of The Ball Shop is Kaley Damore, also present during the transaction was her father Vincent Smith, the ball was never secured with the court system and Jesse Morales was never bailed out of court. The Ball Shop has never been certified by PA Insurance Department nor Berks County Clerk of Courts to accept ball and process ball, as to law, value, intention or other state of mind, this being in violation of section 3922(a)(1) of the PA Crimes Code

<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	---

<input type="checkbox"/> 2	3925	(a)	of the	PA Crimes Code	1	F3	130	280
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Lead? Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	AOPC/UCR/NIBRS Code

Statute Description (Include the name of the statute or ordinance):
RECEIVING STOLEN PROPERTY

Acts of the accused associated with this Offense:
PACC 3925(a) Receiving Stolen Property, f3

IN THAT, on or about said date, THE DEFENDANT did intentionally receive, retain or dispose of movable property, namely, \$5000.00 cash, belonging to Dinora Vasquez, with no intent to restore it to the owner, knowing that such property was stolen, or believing that it had probably been stolen, in violation of Section 3925(a) of the PA Crimes Code.

2019/THU 03:05 PM MDJ23106

FAX No. 610-921-3625

P. 010



POLICE CRIMINAL COMPLAINT

Docket Number: CR 204-19	Date Filed: 5/2/19	OYNALiveScan Number 4 704202 -2	Complaint/Incident Number 66-19-06347
Defendant Name KALEY	First ELIZABETH	Middle DAMORE	Last

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____	
<input type="checkbox"/> Lead? Offense #	3	4107	(a)(2)	of the	PA Crimes Code
					1
					F3
					110 268
PennDOT card (if Applicable)	Accident Number	PA Statute (Title)	Counts	Grade	NCIC Code
					AOPC/UCR/NIBRS Code
Statute Description (Include the name of the statute or ordinance):		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	

DECEPT/BUSINESS/QUANTITY

Acts of the accused associated with this Offense:
PACC 4107(a)(2) Deceptive or Fraudulent Business Practices

IN THAT, on or about said date, THE DEFENDANT in the course of business, did sell, offer or expose for sale, or deliver less than the represented quantity of a commodity or service, namely, too \$5000.00 cash from Dinora Vasquez while purporting to operate as a licensed Bail Agent in Berks County PA then never submitting the bail to the Berks County Court System to get Jesse Morales out of Berks County Prison, Berks County Clerk of Courts has not issued nor is The Bail Shop (owned by Kaley Damore) certified to write bail in Berks County PA, Damore's father Vincent Smith was also present in The Bail Shop during this transaction with the victim Dinora Vasquez, in violation of Section 4107(a)(2) of the Crimes Code.

FILED ON INFORMATION RECEIVED AND INVESTIGATION CONDUCTED.

MAY/02/2019/THU 03:05 PM MDJ23106

FAX No. 610-921-3625

P. 011

Docket Number: CR 204-A	Date Filed: 5/2/19	OTN/Live Scan Number: 4 704202-2	Complain/Incident Number: 66-19-06347
Defendant Name: KALEY	First: ELIZABETH	Last: DAMORE	

POLICE CRIMINAL COMPLAINT**AFFIDAVIT OF PROBABLE CAUSE**

On April 27, 2019 Dinora Vasquez contacted Muhlenberg Police Officer Samuel Calabria to report the following theft of money from her.

Vasquez went to The Bail Shop on April 15, 2019 located at 2845 N. 5th St. Highway and presented \$5000.00 cash to the office staff (Belisa Luna and Ms. Janeyris) in an effort to get her son Jesse Morales bailed out of jail. Kaley Damore is listed as the President of the Company and Bail Agent. Her father Vincent Smith was present in the office during this transaction and was watching as the \$5000.00 cash was counted out.

Vasquez came to the Police station on April 27, 2019 as her son still had not been released from jail and that The Bail Shop has not done anything to present the \$5000.00 that she gave them in an effort to bail her son out of jail. When Vasquez went back to the Bail Shop to find out what was happening she was told they were waiting on their insurance to be approved so that the bail could be presented.

On April 30, 2019 this Investigator spoke with Bath Bond Deputy Clerk of the Berks County Clerk of Courts. She advised that The Bail Shop and Kaley Damore have never been issued a Bond License to write bail in Berks County and that both Kaley Damore and her father Vincent Smith have had their Bail Bond Agent licenses suspended by both The County of Berks and The PA Insurance Department. This was also confirmed with David J. Sweitzer Division Chief of Pennsylvania Insurance Department Bureau of Licensing and Enforcement.

FILED ON INFORMATION RECEIVED AND INVESTIGATION CONDUCTED.

I, JAMES A. POLLOCK, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this 2nd day of May

5/2/19 Date

My commission expires first Monday of January,



EXHIBIT D

ATTACHMENT 10

2019/THU 03:10 PM MDJ23106

FAX No. 610-921-3625

P. 001

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BERKS

Arrest Warrant

Commonwealth of Pennsylvania
v.
Kaley Elizabeth Damore

Mag. Dist. No. : MDJ-23-1-06

MDJ Name : Honorable Dean R. Patton

Address : 3200 Reading Crest Avenue
Reading, PA 19605

Telephone : 610-929-4440

Complaint No: 66 19 06347

Charging Officer: Pollock, James A. Jr.

Arresting Agency: Muhlenberg Township Police Dept

Case Filed: 05/02/2019

OTN: U 704202-2

Reason For Warrant: Felony

Offense Date: 04/16/2019

Lead Offense: 18 § 3922 §§ A1 Theft By Decep-False Impression

Issued For: Kaley Elizabeth Damore

Docket No: MJ-23106-CR-0000204-2019

NCIC OFF:

OOC:

WARRANT ID: DIS708595464

Warrant Control No: 23106-AW-0000260-2019

TO THE AGENCY: Berks County Sheriff

In the name of the Commonwealth of Pennsylvania, you are commanded to take the defendant, Kaley Elizabeth Damore, into custody. When the defendant is taken into custody, bring the defendant before me at the Court address shown above to answer the complaint charging the defendant with the offense(s) set forth above and further to be dealt with according to law.

Witness the hand and official seal of the issuing authority on this 2nd day of May, 2019.

Replace
last name change

May 02, 2019

Date


Magisterial District Judge Dean R. Patton


EXHIBIT E

Attachment 1

Detach this wallet size license and carry on your person.



Kaley Elizabeth Damore License Number 656789	
License Type: Resident Producer Indv Effective Date: June 13, 2016 Expiration Date: October 31, 2019	
Kaley Elizabeth Damore 5107 STOUTS FERRY BRIDGE ROAD READING, PA 19605	Lines of Authority: Casualty and Allied Lines, Property and Allied Lines
5112249184	

- This is your new License. Please note your new license number and check your lines of authority to be certain they are correct.
- If your license is subject to Continuing Education (CE) requirements, this requirement **MUST BE SATISFIED** prior to your license expiration date.
 - To obtain information on your CE requirements and current CE status, access www.sircon.com/pennsylvania
- You must notify the Insurance Department of address changes within 30 days of the change.
 - You may report the address change via e-mail sent to ra-in-producer@pa.gov
- For additional information on the services of the Insurance Department visit our website at www.insurance.pa.gov
- You must notify the Insurance Department in writing within 30 days of being charged with any misdemeanor or felony.

Visit the Pennsylvania Insurance Department's WEB Site at www.insurance.pa.gov

DETACH BELOW

Kaley Elizabeth Damore
Licensee does business under at least one trading name, alias or former name.
License Number 656789

is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules

License Type: Resident Producer Indv

Effective Date: June 13, 2016
Expiration Date: October 31, 2019

Kaley Elizabeth Damore
5107 STOUTS FERRY BRIDGE
ROAD
READING, PA 19605



Lines of Authority:
Casualty and Allied Lines, Property and Allied Lines



5112249164

EXHIBIT F

Attachment 2

Detach this wallet size license and carry on your person.



BAIL SHOP LLC License Number 807072	
License Type: Resident Producer Agy Effective Date: March 22, 2017 Expiration Date: March 22, 2021	
BAIL SHOP LLC 760 CUMBERLAND ST LEBANON, PA 17042	Lines of Authority: Casualty and Allied Lines
 1172371313	

- This is your new License. Please note your new license number and check your lines of authority to be certain they are correct.
- If your license is subject to Continuing Education (CE) requirements, this requirement **MUST BE SATISFIED** prior to your license expiration date.
 - To obtain information on your CE requirements and current CE status, access www.sircon.com/pennsylvania
- You must notify the Insurance Department of address changes within 30 days of the change.
 - You may report the address change via e-mail sent to ra-in-producer@pa.gov
- For additional information on the services of the Insurance Department visit our website at www.insurance.pa.gov
- You must notify the Insurance Department in writing within 30 days of being charged with any misdemeanor or felony.

Visit the Pennsylvania Insurance Department's WEB Site at www.insurance.pa.gov

DETACH BELOW

BAIL SHOP LLC
License Number 807072

is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules

License Type: Resident Producer Agy

Effective Date: March 22, 2017
Expiration Date: March 22, 2021

BAIL SHOP LLC
760 CUMBERLAND ST
LEBANON, PA 17042



Lines of Authority:
Casualty and Allied Lines



EXHIBIT G

Attachment 15

Reading Eagle Facebook Page May 3, 2019, 1:25 PM



Reading Eagle

May 3 at 1:25 PM ·

Vincent J. Smith and his daughter, Kaley E. Damore, turned themselves in for arraignment Thursday night.

READINGEAGLE.COM

A Berks man convicted of writing phony bail bonds is charged in the same crime; this time, so is his daughter

[7 Comments](#)[12 Shares](#)

WFMZ May 3, 2019, 3:22 PM

MUHLENBERG TWP., Pa. - A Berks County bail bondsman once convicted of writing phony bail bonds is now accused of doing it again.

Vincent Smith and his daughter, Kaley Damore, took thousands of dollars from a woman trying to bail her son out of jail, police said.

"This is despicable behavior," said Berks County District Attorney John Adams.

Investigators said the woman gave \$5,000 cash to The Ball Shop on the North Fifth Street Highway in Muhlenberg Township on April 15.

Police said Smith, 58, was there at the time and watched as the money was counted.

"I am quite alarmed at the fact that, again, he's involved in bail in Pennsylvania," Adams said.

Smith's license was revoked after he pleaded guilty to forgery in 2015 for writing fake bail bonds.

"This is the type of businessman this individual is," Adams said.

His daughter was also charged in the previous case.

Last Saturday, nearly two weeks after the woman paid the bail, her son was still not out of jail. She asked the company what the holdup was, according to court documents. The staff allegedly told her it was waiting for insurance.

Investigators said the shop doesn't have a license, and Smith and Damore's licenses are suspended.

"That \$5,000, at this point, has not been returned to the victim," Adams said. "This is clearly fraudulent. This is clearly another deceitful, deceptive business."

Staff working at The Bail Shop on Friday had no comment on the case.

Smith, 58, of Lower Heidelberg Township, and Damore, 27, of Muhlenberg Township, were charged with theft by deception-false impression, receiving stolen property, and deceptive business practices.

Smith was committed to the Berks County Jail on \$10,000 bail; Damore was freed on \$25,000 unsecured bail.

EXHIBIT H

Attachment 16

Berks DA withdraws charges against pair in bail bonds case

By:

- [69 News](#)

Posted: May 09, 2019 01:52 PM EDT

Updated: May 09, 2019 01:52 PM EDT



READING, Pa. - Prosecutors have withdrawn criminal charges against a Berks County man and his daughter in connection with their operation of a bail bonds business.

District Attorney John Adams said law enforcement authorities have insufficient evidence to proceed with their case against Vincent Smith and his daughter, Kaley Damore, at this time. The charges, he added, could be refiled in the future.

Smith, 58, of Lower Heidelberg Township, and Damore, 27, of Muhlenberg Township, were arrested last week on charges of theft by deception - false impression, receiving stolen property, and deceptive business practices.

The charges, officials said, stemmed from their business, The Bail Shop on the North Fifth Street Highway in Muhlenberg Township, being given \$5,000 cash by a woman trying to bail her son out of jail. The business, they said, did nothing with the money.

Investigators said The Bail Shop doesn't have a license, and that Smith and Damore's licenses as bail bonds agents are suspended.

Smith pleaded guilty to forgery in 2015 for writing fake bail bonds. His daughter was also charged in that case.